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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ERIC GOODMAN
IN SUPPORT OF *EX PARTE* MOTION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS PURSUANT TO
B.L.R. 9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING
ON MOTION FOR ENTRY OF AN
ORDER (I) ESTABLISHING A BAR
DATE FOR FILING FIRE CLAIMS,
(II) APPROVING THE FORM AND
PROCEDURES FOR NOTICE OF THE
BAR DATE FOR FIRE CLAIMS, AND
(III) APPROVING SUPPLEMENTAL
PROCEDURES FOR NOTICE OF THE
BAR DATE TO FIRE CLAIMANTS**

Related Document: Dkt. No. 2297

[No hearing requested]

1 I, Eric Goodman, do hereby declare under penalty of perjury as follows:

2 1. I am a partner at Baker & Hostetler LLP, attorneys for the Official Committee of
3 Tort Claimants (the “TCC”) in the above-captioned chapter 11 cases.

4 2. I submit this declaration in support of the Motion of the TCC (the “Motion to
5 Shorten”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy
6 Court for the Northern District of California, for entry of an order shortening time for a hearing on
7 June 11, 2019, at 9:30 a.m. (the “**Omnibus Hearing**”), on the *Motion of the Official Committee of*
8 *Tort Claimants Pursuant to 11 U.S.C. §§ 105(a), 501 and Fed. R. Bankr. P. 3001(a), 3003(c), 5005*
9 *and 9007 for Entry of an Order (I) Establishing a Bar Date for Filing Fire Claims, (II) Approving*
10 *the Form and Procedures for Notice of the Bar Date for Fire Claims, and (III) Approving*
11 *Supplemental Procedures for Notice of the Bar Date to Fire Claimants* (the “**TCC Motion**”) (Dkt.
12 No. 2297). The TCC requests that written objections, if any, be due by 4:00 p.m. (Pacific Time)
13 on June 10, 2019.

14 3. On May 29, 2019, I sent an e-mail to the Debtors’ counsel inquiring as to whether
15 the Debtors would consent to notice being shortened on the TCC Motion. On May 30, 2019, the
16 Debtors’ counsel informed me that the Debtors do not object to shortening time so that the TCC
17 Motion is heard on June 11, 2019, at 9:30 a.m. (Pacific Time), subject to an objection deadline of
18 June 10, 2019, at 4:00 p.m. (Pacific Time).

19 4. Ample cause exists to hear the TCC Motion on shortened time at the Omnibus
20 Hearing on June 11, 2019, at 9:30 a.m. (Pacific Time). By granting the Motion to Shorten, the
21 Court would be in a position on June 11, 2019 where it could not only grant the TCC’s Claim Form
22 Motion (Dkt. No. 1824) and adopt the TCC’s model proof of claim form for Fire Claims, but also
23 approve the bar date and notice plan proposed by the TCC. Further, to advance these Chapter 11
24 Cases, the TCC wants to implement its notice plan as soon as practicable.

25 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
26 inquiry, the foregoing is true and correct and that this declaration was executed at Cleveland, Ohio,
27 on May 31, 2019.

28 /s/ Eric Goodman
Eric Goodman